

**To:** chess@idem.IN.gov[chess@idem.IN.gov]  
**From:** Ireland, Scott  
**Sent:** Tue 9/30/2014 2:05:34 PM  
**Subject:** Draft NOI reviews

Catherine,

We are working through the list of NOI's you sent.

With respect to: ING080000 Ground Water Petroleum Remediation Systems; we have no additional comments on this one.

With respect to: ING340000 Petroleum Products Terminals, we have the following comments:

1. In Section "D": SOURCE WATER INFORMATION on page 3 of 8 of the NOI, the description states in part "...need to complete Part IV of this application...." However, no Part IV is provided in the NOI. Please provide Part IV to the NOI or reference where Part IV may be found and describe the purpose for Part IV being stated.

2. In PART (I): ADDITIONAL REQUIRED ATTACHMENTS – 29. PROOF OF PUBLICATION in the 1<sup>st</sup>/ paragraph on page 5 of 8 of the NOI states "... (NPDES) general permit ING250000 to discharge non – process wastewater from a petroleum products terminal." The Petroleum Products Terminals *General Permit Number of ING340000*. Please clarify whether the general permit number of ING250000 is a typographical error or there is another Petroleum Products Terminal *General Permit Number of ING340000*.

3. In APPENDIX "A": SUPPLEMENTAL INSTRUCTIONS on page 6 of 8 of the NOI all of the **ELIGIBILITY REQUIREMENTS Item X**: are (i) not all **ELIGIBILITY REQUIREMENTS Item X** are totally stated and (ii) under **ELIGIBILITY REQUIREMENTS Item 9** states 40 CFR §122.26 "Storm Water Discharges". Please provide a list of all **ELIGIBILITY REQUIREMENTS Item X** and state all relevant provisions of 40 CFR §122.26 "Storm Water Discharges" that are pertinent to Petroleum Products Terminals under *General Permit Number of ING340000*.

4. Under APPENDIX "A": SUPPLEMENTAL INSTRUCTIONS – **Part F, Items 20 and 21**: under **A. Existing Sources** in the 2<sup>nd</sup>/ paragraph on page 7 of 8 of the NOI are stating the following pollutants or parameters Biochemical Oxygen Demand (BOD),

Total Suspended Solids (TSS), Fecal coliform, pH, Total Residual Chlorine (TRC), Oil & Grease (O & G), Temperature (°F or °C) and Ammonia [NH<sub>3</sub> (as "N")] to be analyzed under the provisions of 40 CFR Part 136. Please provide a detailed explanation for clarity as to the reason(s) for being primarily a domestic discharge based rather than a petroleum based analyses.

5. Under APPENDIX "A": SUPPLIMENTAL INSTRUCTIONS – **Part F, Items 20 and 21**: under **B. New Dischargers** in the 2<sup>nd</sup>/ sentence on page 7 of 8 of the NOI states "Please note that follow up testing and reporting are required no later than two (2) years after the facility starts to discharge." Please provide a detailed explanation to clarify the following: (i) the reason(s) for the two (2) years maximum for a New Discharger to provide to IDEM any reports including test analyses, (ii) same requirements as outlined in #4 above and (iii) the reason(s) for not stating compliance with 40 CFR Part 136 pertaining to analyses of pollutant parameters.

6. Under APPENDIX "A": SUPPLIMENTAL INSTRUCTIONS – **Part F, Items 20 and 21**: under **C. Testing Weavers** in the 3<sup>rd</sup>/ sentence on page 7 of 8 of the NOI states "The permitting authority may waive the requirements for information about any pollutant or parameter if he determines that less stringent reporting requirements are adequate to support issuance of the permit." Please provide an explanation to clarify the reason(s) for stating "less stringent reporting requirements are adequate to support issuance of the permit" and must site any and/or all statutes, regulations, laws under the Code of Federal Regulations (CFR), United States Code (U.S.C.), Clean Water Act (CWA), etc.

Thanks,

Scott

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